

11/14/05



Puget Sound Clean Air Agency

Compliance Status Report

110 Union Street, Suite 500
Seattle, WA 98101-2038
Ph: 206.343.8800 / 1.800.552.3565
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www.pscleanair.org

Inspection Date: 11/14/05Time: 10:50 AM

Case/Registration No. <u>R# 15019</u>	Name <u>Longview Fibre Co.</u>			Responsible Person, Title <u>Eric Perantie</u>
Site Address <u>5901 E Marginal Way So</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>	
Mailing Address	City, State	Zip	Phone <u>(206) 7</u>	

- ☒ I observed no violations of our agency's regulations during my inspection in the areas I inspected.
- ☐ I could not make a compliance determination because:
- ☐ I need to consult with others. I will share my conclusions with you either in person, over the phone, or in writing by _____.
 - ☐ I need more information. Please submit the following information by _____.

Good job keep boiler daily oil m log and water chemistry log up to date. The next Semi-Annual oil-fired sulfur report per NSPS 40 CFR subpart Dc is due 12/30/05.

The starch silo Baghouse is rated at 500 CFM < 2000 CFM & therefore does not require registration

Issued By:

Received By:

Date/Time:

11/14/0510:55 AM

USEPA SF



1259947

Activity Record		
Activity	Initials	Date
1. Evaluation	<i>OG</i>	11/15/05
2. Linda/Valerie	<i>OG</i>	1-24-06
3. Data Entered		
4. GSP	<i>MOB</i>	11/21/05
5.		
6.		
7. Central Files		

Puget Sound Clean Air Agency
110 Union Street, Suite 500
Seattle, WA 98101-2038

Evaluation Report

Reg #: 15019
AFS #: 15019
Status: Active - 2005 Paid

40 CFR Part 60 Dc

Facility: Longview Fibre Co
Physical Address: 5901 E Marginal Wy S
Seattle
Invoice Address: PO Box 24867
Seattle

98134

WA 98124-0867

Personal Protective Equipment Checklist

Determined by Inspector based on
Compliance Manual Policy 101

Worn	Safety Equipment	Reg/Op
<input type="checkbox"/>	None	
<input type="checkbox"/>	Hard Hat	
<input type="checkbox"/>	Goggles	
<input type="checkbox"/>	Safety Glasses	
<input type="checkbox"/>	Hearing Protection	
<input type="checkbox"/>	Respirator	
<input type="checkbox"/>	Safety Shoes	R
<input type="checkbox"/>	Rubber Boots	
<input type="checkbox"/>	Leather Gloves	
<input type="checkbox"/>	Chemical Gloves	
<input type="checkbox"/>	Coveralls	
<input type="checkbox"/>	Tyvek	
<input type="checkbox"/>	Safety Vest	
<input type="checkbox"/>	Other	

Inspector EMG Engineer GSP

Last Onsite Compliance 12/03/2004

Contacted

☐ Tom Craig, Plant Manager

Phone (206) 762-7170

Fax

E-mail

☐ Eric Perantie, Maint Supervisor

(206) 762-7171 ext 262

esperantie@longfibre.com

☐ Belton Rogers

(206) 762-7170

☐

☐

North American Industrial Classification System (NAICS): 322211 - Corrugated and Solid Fiber Box Manufacturing

Evaluation Date: 11/14/05 10:30am

Clean Air Reps: E Gilpin

Evaluation Type: ☐ Onsite Compliance ☐ Onsite Observation ☐ Follow-up

Evaluation Summary: Routine inspection. NSPS Boiler on-line burning natural gas. oil burned only during curtailment. Paper boiler Cyclone is >20,000 CFM & requires registration. Starch Baghouse is <2,000 CFM - Remove from Registration

Updates: ☐ AOD ☒ Equipment ☒ NOC ☐ Operating Status ☐ Owner/Name ☐ Other

Attachments: CSR for no deficiencies

NOV/WW # Issued:

Other Action:

Evaluation Prepared by: M. [Signature]

Date: 11/14/05

Onsite Compliance Evaluations (Last 3)

Eval Date	Inspector	Inspector Notes	NOV/WW
12/03/2004	EMG	W W 2-000342 OA 6264 # 5. 5.05(e) Update File. Update Equip List.	2-000342
12/10/2002	EMG MM	Observed steam plume from boiler - on roof for presence of So. Park Odor. No odors observed.	
07/31/2001	EMG	CSR - Info request re: NC 6264 cond # 5. Update equip list.	

Onsite Observation Evaluations (Last 3) - None

Offsite Report Evaluations (Last 18 Months)

Eval Date	Engineer	Inspector	Report Type	Month	Year	Subpart	Stack Test CAS	Stack Test EU	NOV/WW
08/26/2005	GSP	EMG	NSPS			Dc			

Onsite Complaint Evaluations (Last 3) - None

Violation History (Last 2 Years)

Issue Date	Issued By	NOV/WW	NOV Type	Violation Date	Closed?
12/03/2004	EMG	2-000342	Other	12/03/2004	<input checked="" type="checkbox"/>

Open AOD Conditions - None

Notices of Construction / Notifications Evaluation Pending

Inactive?	NOC / Notice #	Approved	Evaluated
<input type="checkbox"/>	824 Cyclone On Shredder	09/29/1972	11/14/05

Notices of Construction / Notifications

Inactive?	NOC / Notice #	Approved	Evaluated
<input type="checkbox"/>	6264 Boiler @ 25 Mmbtu/Hr	12/05/1995	08/02/1996

Conditions

4. Longview Fibre Co. (LFC) is subject to requirements of 40 CFR 60 Subpart Dc and shall notify EPA of the installation.
5. LFC shall operate these boilers using No. 2 oil with no more than 0.05% sulfur. Records shall be maintained for a period of two years and made available to PSAPCA personnel upon request.
6. Within 180 days of startup of the boilers, LFC shall perform a compliance test according to Regulation I, Section 3.07, to demonstrate compliance with the NOx and CO limits in Condition No. 7.
7. The emissions of this boiler shall not exceed any of the following: a. NOx = 0.05, CO = 0.05, SO2 = 0.01, VOC = 0.02 lb/MMBtu one-hour average on natural gas. b. NOx = 0.20, CO = 0.10, SO2 = 0.60, VOC = 0.05 lb/MMBtu one-hour average on No. 2 oil. c. PM-10 = 0.02 gr/dscf @ 7% O2. d. Source test methods are EPA Methods 6C for SO2, 7E for NOx, 10A for CO, and 25A for VOC; and PM-10 by PSAPCA procedure in Resolution 540 dated Aug 11, 1993.
8. It shall be unlawful for LFC to cause or allow the emission of any air contaminant from this boiler which exceeds 10% opacity according to EPA Method 9.

Description

One natural gas/No. 2 oil fired Cleaver-Brooks Boiler rated at 25.1 MMBtu/hr.

Air Contaminant Generating Equipment, Associated Control Equipment

Inactive?	Equipment	Year Installed:	NC/NOT #:
<input type="checkbox"/>	(1) Boiler Cleaver Brooks Rated: 25 Million BTU/Hr Natural Gas / Dist (#2 Oil or PS-300)	1996	6264
<input type="checkbox"/>	(2) Storage Bin/Silo System NE Exterior Corn Starch Silo Rated: 55000 Lb		
<input type="checkbox"/>	exempt from Registration *CE (2) Baghouse On Top Of Silo 50 Bags Rated: 500 CFM		
<input type="checkbox"/>	* (3) Paper Shredder		
<input type="checkbox"/>	remove asterisk *CE (1) Single cyclone	12,000 CFM	

Air Contaminant Generating Equipment, Associated Control Equipment
Inactive?

Paper Shredder And Presses

Rated: 42000 CFM Year Installed: 1972 NC/NOT #: 824

* This item does not require a Notice of Construction.

Other Control Equipment - None

Emission Summary - None for 2003 or 2004

Longview Fibre Company R# 15019
5901 E. Marginal Way So.
Seattle, WA. 98134

11/14/05 10:50 AM

I arrived on-site wearing my Agency ID and contacted Eric Perantie, Maintenance General Supervisor for Longview Fibre. I explained the inspection objectives to him:

- Inspect for compliance
- Discuss the processes at the facility
- Review the operations and maintenance logs
- Review the boiler fuel oil data sheet, record keeping and reporting requirements under the NSPS subpart Dc

Operations

The source manufactures corrugated boxes from paper. The source also prints designs on the boxes using low voc ink (< .5 lb/gallons containing no HAPS). Longview applies the inks in one of six flexographic printing presses. The Longview Washington Pulp and Paper mill provides large rolls of brown paper to the source. The source operates two 8-hr. shifts per day. The source shreds trim from the corrugated line, as well as bad product. The cyclone collects the pieces; they are compressed into large bales and sent to Japan by container ships. The cyclone is rated at 42,000 cfm and therefore it requires registration with the Agency per Reg. I 5.03(a)(7). The starch baghouse is rated at 500 cfm. Since the rating is less than 2,000 cfm, the baghouse does not require registration per Reg. I 5.03(a)(6)(A). See change made to equipment list.

NSPS Subpart Dc Boiler

I inspected the boiler. It was on-line burning natural gas. The boiler provides heat for the large pressure vessels that create the corrugated cardboard. The boiler burn rate varies from 10% to 80% as measured by an electronic meter. I reviewed the boiler O&M log and I observed that the source was conducting daily maintenance on the boiler and documenting stack gas temperature, steam pressure, fuel supply pressure, low water cutoff, boiler blowdown, and water chemical treatment. Sulfite readings were high (out of range) on 11/3 and 11/11. The range is 30 to 60 and the readings were 150. Mr. Perantie believes there is a problem with the sulfite pump. Nalco Company audits Longview's boiler water chemistry once per month. Cole Industries conducts a tune up on the boiler on a yearly basis. Longview has not burned diesel oil in the boiler this year. They burn diesel oil in the boiler only during periods of curtailment.

I reminded Mr. Perantie that the diesel No. 2 fuel for the boiler must contain 0.05% sulfur or less. The Federal NSPS limits the sulfur content in the oil to 0.5% by weight. However, the order of approval No. 6264 limits the sulfur content in the oil to 0.05%. Mr. Perantie has been submitting semi-annual fuel oil reports to the Agency as required by the Federal Neshaps.



11/15/05

Cyclone and Baghouse on Roof

I did not inspect the cyclone or the cornstarch silo baghouse on the roof. I observed no visible emissions from the roof as I drove to the facility. The baghouse operates only when the corn starch silo is being filled. The source receives cornstarch deliveries once per week.

Closing Conference

We returned to the office. I issued a CSR for no deficiencies. I discussed the applicable regulations with Mr. Peranti including Reg. I 5.05(b) demonstrate emissions are below reporting thresholds, Reg. I 9.20, 9.15, and the boiler NSPS.



11/15/05